

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**LAJARRA JEFFERSON**

**Plaintiff,**

**VS.**

**MOBIS ALABAMA, LLC**

**Defendant.**

**CASE NUMBER: 2:06-cv1110-MHT**

**MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

COMES NOW, Defendant MOBIS Alabama, LLC (the “Defendant”) and hereby files this Motion for Extension of Time to file Answer. As grounds for this motion, Defendant states as follows:

1. Plaintiff filed her Complaint on December 15, 2006, and service was to be made via certified mail on Defendant's registered agent, CT Corporation.
2. CT Corporation was served via certified mail on December 21, 2006, and notice to that effect was sent via Federal Express to MOBIS Alabama, LLC. However, MOBIS Alabama, LLC was closed for the Christmas holidays from December 21, 2006 up to and including January 1, 2007 and no one was available to receive mail.
3. On January 2, 2007 MOBIS received via Federal Express from CT Corporation a copy of the Complaint reflecting service on CT Corporation on December 21, 2006. The Answer is currently due on January 10, 2007.

4. On January 3, 2007, Henry C. Barnett, Jr., principal counsel for the Defendants, and the only counsel with comprehensive knowledge of the facts of this matter, began a scheduled fifteen (15) day vacation to celebrate his thirty-fifth wedding anniversary.

5. In order to allow Defendant's counsel a reasonable time to prepare an answer to Plaintiff's Complaint, Defendant requests that this Court grant Defendant an additional twenty (20) days from the date of the filing of this motion in which to file their answer to Plaintiff's Complaint.

6. Counsel for the Plaintiff authorized Defendant's counsel to note that **this motion is not opposed.**

WHEREFORE, Defendant respectfully requests that this Court enter an order allowing Defendant twenty (20) days from the date of filing this motion in which to file an answer to Plaintiff's Complaint.

Respectfully submitted,

/s/Bruce J. Downey, III  
Bruce J. Downey, III (DOW006)  
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ATTORNEY FOR DEFENDANT  
MOBIS ALABAMA, LLC

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of January 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Adam M. Porter  
2301 Morris Avenue, Suite 102  
Birmingham, Alabama 35203

/s/Bruce J. Downey, III  
OF COUNSEL